

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LEONARD YOUNG, ~~THATTO~~

PLAINTIFF(S)

PLAINTIFF AMENDED  
ORIGINAL COMPLAINT

V.

CIVIL ACTION No: 1:22-cv-327

PA. DEPARTMENT OF CORRECTIONS, SCT-

ALBION SUPERINTENDANT L.S. OLIVER,

IMMINENT DANGER CLAIM

DEPUTY PATRICIA THOMPSON, CORRECTIONS

DETERMINED CONTESTED CUREM

HEALTHCARE ADMINISTRATOR (CHCA) OF SCT-

ALBION <sup>MR. EDWARDS</sup> ~~JOHN/SANE~~ DOE, (CCPM) CORRECT-

JURY TRIAL DEMAND

IONS CLASSIFICATION PROGRAM MANAGER KURT

MENTATION REQUESTED

SUESSER, CHIEF PSYCHOLOGIST OF SCT-ALBION DR.

GLAUC RUSH, DR. GODEMEYER, DR. LUCAS, DR.

EVANS, GRIEVAANCE CO-ORDINATOR C. GIDDINGS

LT. BASHER, CPT. JENKINS

(ALL DEFENDANTS SUED IN PERSONAL, INDIVIDUAL,

AND OFFICIAL CAPACITY)

**FILED**

NOV 18 2022

CLERK U.S. DISTRICT COURT  
WEST-DIST. OF PENNSYLVANIA

## I. JURISDICTION + VENUE.

1. THIS IS A CIVIL ACTION AUTHORIZED BY 42 U.S.C. SECTION 1983 TO REDRESS THE DEPRIVATION, UNDER COLOR OF STATE LAW, OF RIGHTS SECURED BY THE CONSTITUTION OF THE UNITED STATES. THE COURT HAS JURISDICTION UNDER 28 U.S.C. SECTIONS 1331 AND 1343 (a). PLAINTIFF(S) SEEKS DECLARATORY RELIEF PURSUANT TO 28 U.S.C. SECTIONS 2201 AND 2202. PLAINTIFF(S) CLAIMS FOR INJUNCTIVE RELIEF ARE AUTHORIZED BY 28 U.S.C. SECTION 2283 & 2284 AND RULE 65 OF THE FEDERAL RULES OF CIVIL PROCEDURE. PLAINTIFF(S) ASK THIS COURT TO ADDRESS CONSPIRACY OF DEPRIVATION OF RIGHTS, UNDER COLOR OF STATE LAW, AND VIOLATION OF (PREA) PRISON RAPE ELIMINATION ACT OF 2000, 42 U.S.C. § 15601 ET SEQ., AND ITS IMPLEMENTING REGULATIONS, 28 C.F.R. § 115 ET SEQ.

2. THE WESTERN DISTRICT OF PENNSYLVANIA IS AN APPROPRIATE VENUE UNDER 28 U.S.C. SECTION 1391 (b)(2) BECAUSE IT IS WHERE THE EVENTS GIVING RISE TO THIS CLAIM OCCURED.

## II. PLAINTIFF(S)

3. PLAINTIFF(S), LEONARD YOUNG, ~~AND DISTRICT PRISONER~~ IS AND WAS AT ALL TIMES MENTIONED HAZARD PRISONER'S OF THE STATE OF PENNSYLVANIA IN THE CUSTODY OF THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS. <sup>SHE IS</sup> ~~THEY ARE~~ CURRENTLY CONFINED IN STATE CORRECTIONAL INSTITUTE (SCI) ALBION, IN ALBION PA.

4. DEFENDANT PA. DEPARTMENT OF CORRECTIONS IS THE HOLDER /ENTER/ OF THE STATE OF PA. DEPARTMENT OF CORRECTIONS. THE ENTITY IS LEGALLY RESPONSIBLE FOR THE OVERALL OPERATIONS OF THE DEPARTMENT AND EACH INSTITUTION UNDER ITS JURISDICTION AND POLICY AND PROCEDURES BEING FOLLOWED AT SCI-ALBION.

5. DEFENDANT SUPERINTENDANT LOUISE J. OLIVER IS THE SUPERINTENDANT OF SCI-ALBION. SHE IS LEGALLY RESPONSIBLE FOR THE OPERATION OF SCI-ALBION AND FOR THE WELFARE OF ALL THE INMATES IN THAT PRISON.

6. DEFENDANT DEPUTY PATRICIA THOMPSON IS THE DEPUTY OF CENTRALIZED SERVICES AT SCI-ALBION. SHE IS LEGALLY RESPONSIBLE FOR THE OPERATIONS OF SERVICES/PROGRAMS, ~~OPER~~ AT SCI-ALBION AND FOR THE WELFARE OF ALL THE INMATES IN THAT PRISON.

7. DEFENDANT CHOA JOHN/JANE DOE IS THE HEAD MEDICAL HEALTH CARE ADMINISTRATOR AT SCI-ALBION. JOHN/JANE DOE IS LEGALLY RESPONSIBLE FOR THE STAFF/MEDICAL AND MEDICAL HEALTH PROFESSIONALS AND OPERATIONS OF SCI-ALBION AND FOR THE WELFARE OF ALL THE INMATES IN THAT PRISON.

8. DEFENDANT KURT SUESER IS THE (CCPM) CORRECTIONS CLASSIFICATION PROGRAM MANAGER, AT SCI-ALBION. HE IS DIRECTLY RESPONSIBLE FOR CLASSIFICATION OF LECTER PRISONERS AND

<sup>HER</sup>  
~~THEIR~~ SAFETY AS WELL AS ASSURING PREA IS BEING FOLLOWED TO THE LETTER OF LAW. HE IS LEGALLY RESPONSIBLE FOR THE OPERATIONS OF SCI-ALBION DIRECTLY FOR THE WELFARE OF ALL THE INMATES IN THAT PRISON.

9. DEFENDANTS PSYCHOLOGIST DR. CRAIG RUSH AND DR. GODSMAN ARE THE CHIEF/MAJOR PSYCHOLOGIST AT SCI-ALBION. THEY ALONE ARE RESPONSIBLE FOR THE MENTAL HEALTH MEDICATIONS AND DIAGNOSIS OF MENTALLY ILL PRISONERS AND FOR THE WELFARE OF ALL MENTAL HEALTH IN THAT PRISON AND LEGALLY RESPONSIBLE.

10. DEFENDANT(S) DR. EVANS AND DR. LUCAS ARE THE MAJOR/CHIEF PSYCHOLOGY DOCTORS AND DR. LUCAS IS THE MENTAL HEALTH CO-ORDINATOR AT SCI-ALBION. THEY RESPECTIVELY ARE DIRECTLY RESPONSIBLE FOR THE CARE, CUSTODY, AND CONTROL OF ALL MENTAL HEALTH PRISONERS AND TO ASSURE THEY GET THE PROPER TREATMENT IN THAT PRISON AND LEGALLY RESPONSIBLE FOR THEM.

11. DEFENDANT C. GIDDONS IS THE SUPERINTENDANT'S ASSISTANT/SECRETARY AND THE FACILITY GRIEVANCE CO-ORDINATOR AT SCI-ALBION. SHE IS LEGALLY RESPONSIBLE FOR THE POLICY PROCEDURES TO BE FOLLOWED AS WELL AS THE PLRA EXHAUSTION AND GRIEVANCE TO BE PROPERLY FILED. IT IS A RESPONSIBILITY OF HERS TO HAVE ANY DIRECT NOTICE OF VIOLATION OF POLICY THAT AFFECTS WELFARE OF THE PRISONERS.

12. DEFENDANT LT. BASHOR IS THE PROB LT. AT SCI-ALBION. SHE IS DIRECTLY RESPONSIBLE FOR HANDLING ALL PREA COMPLAINTS AND INVESTIGATIONS AND FOR THE SAFETY AND SECURITY OF INMATES AT SCI-ALBION. CAPT. JIMMY HARRIS ALSO IN THIS.

13. EACH DEFENDANT IS SUED INDIVIDUALLY, PERSONALLY, AND OFFICIALLY IN CAPACITY. AT ALL TIMES MENTIONED IN THIS COMPLAINT, EACH DEFENDANT ACTED UNDER COLOR OF STATE LAW WITH MALICIOUS AND SADISTIC INTENT AND CONSPIRED TO DEPRIVE PLAINTIFF(S) OF RIGHTS UNDER CONSTITUTION OF THE UNITED STATES.

### III. HISTORY OF PLAINTIFF(S)

14. PLAINTIFF LEONARD YOUNG HAS HAD A VERY FACTUAL AND LONG

HISTORY OF MENTAL ILLNESS SINCE EARLY CHILDHOOD THAT HAS BEEN SHOWN ON FEDERAL COURTS RECORDS (SEE YOUNG V. MARTIN CIVIL ACTION # 13-4057 WESTERN DISTRICT THAT ENDS BIPOLAR AND SCHIZOAFFECTIVE DIAGNOSIS. AND ALSO YOUNG V. DR. KUBRIN, ALLEGANY HEALTH NETWORK CIVIL ACTION # 2:19-cv-401 WESTERN DISTRICT) THE FIRST LATER AS A SETTLEMENT IN 2016 AND THE OTHER IS CURRENTLY ACTIVE.

SHE ALSO HAS THE STATE/COUNTY COURTS OF ALLEGANY COUNTY JUDGE DONALD MACHES CC# CP-OR-CR-COLL281-2005 SENTENCING ORDERS THAT SHE IS BIPOLAR AND SCHIZOAFFECTIVE WITH RECOMMENDATIONS TO CONTINUE TO BE TREATED AND MONITORED FOR MENTAL HEALTH ISSUES.

ON OR ABOUT MARCH 2, 2016 PLAINTIFF MOVED OUT OF SEATTLE WASH AT SEE-ALBION AND NOW HAS BEEN RE-COMMITTED UNDER NEW NUMBER. SHE IS TRANSFERRED FROM SEE-HUNTINGDON FOR BEING TRANSGENDER SELF IDENTIFY AS WOMAN/FEMALE. SHE HAD NO SEPARATIONS AT SEE-HUNTINGDON BUT DUE TO COMMUNITY OPINION SHOWERS AS WELL AS OTHER SECURITY ISSUES WAS PLACED IN STOLE CELL AND ORDERED TO SHOWER SEPARATE IN GENERAL POPULATION UNTIL TRANSFERRED TO A FACILITY THAT COULD ACCOMMODATE HER NEEDS AS A TRANSGENDER/WOMAN IDENTITY.

PLAINTIFF WAS SENT TO SEE-ALBION WHERE SHE, AS STATED ABOVE, MOVED OUT FROM ALBION WAS KNOWN AS THE OLD NUMBER PERSON. MS. YOUNG IS A WID-VIOLENT OFFENDER THIS TIME AS WELL AS TRANSGENDER WOMAN IDENTITY AND SEE-ALBION TREATED HER IN SAME/SIMILAR FASHION AS WHEN "SHE" LEFT/MOVED OUT AS A "HE" THE VIOLENT (LEARNED) YOUNG THEY KNEW AND IMMEDIATELY STARTED A CAMPAIGN TO DEIFY HER/PLAINTIFF EVERYTHING FROM TRANSGENDER WOMAN IDENTITY TO MENTAL HEALTH DIAGNOSIS. THE DEFENDANTS NOW SAY PLAINTIFF IS NOT TRANSGENDER, WOMAN IDENTITY AND HAS NO MENTAL HEALTH ISSUES EXCEPT ANTI-SOCIAL PERSONALITY DISORDER (BASICALLY VIOLENT AND MANIPULATIVE) WHICH HAS HARMED HER

IN DANGER BOTH MENTALLY AND PHYSICALLY. PLAINTIFF SADLY IS ONCE AGAIN IN THE RESTRICTED HUSBAND UNIT W/O ANY PSYCH MEDS OR DIAGNOSES/TREATMENT AND HAS MULTIPLE MISDEMEANORS RESULTING IN EXCESSIVE RHO TIME. SHE HAS BEEN HELD IN A HARD CELL HAS NOT GONE TO YARD AT ALL AND HAD NO MORE THAN 5 SHOWERS TOTAL. PLAINTIFF IS BACK TO HEARING VOICES, HAVING DELUSIONS, SMOKING AND EATING HER OWN FECE, HAVING NIGHTMARES, FLASHBACKS AND SELF ABUSE BEHAVIORS OF BEATING HEAD AGAINST THE WALLS, DRIVING OFF SINK HEADFIRST AND ATTEMPTS TO MUTILATE/REMOVE DEVICES. SHE GETS NO HELP AT ALL BECAUSE OF A SYMPATHETIC RESPONSE OF ILLUSIONS FROM THE VERY TOP PEOPLE TO BOTTOM PEOPLE (DEFENDANTS LISTED). PLAINTIFF IS LEFT IN A DETERIORATING AND VERY CRUEL & UNUSUAL SITUATION WITH COURTS HELP THIS WILL NOT BE FIXED AND COULD LEAD TO THE DEATH OF PLAINTIFF LEONARD YOUNG.

#### IV. FACTS OF LEONARD YOUNG

15. ON SEPTEMBER 27TH 2022, PLAINTIFF WAS TRANSFERRED TO SCI-ALBION FROM SCI-HUNTINGDON DUE TO ADMINISTRATIVE MISC BECAUSE SCI-HUNTINGDON COULD NOT APPROPRIATE TRANSGENDER INMATE PLAINTIFF. PLAINTIFF WAS HOUSED SEPARATE CELL AND SEPARATE SHOWER IN GENERAL POPULATION DUE TO SELF IDENTITY AS FEMALE/HUMAN AND TRANSGENDER AND FOR BEING VULNERABLE DUE TO PREVIOUS RAPE AT OTHER INSTITUTION (SCI-HUNTINGDON INVESTIGATED PLAINTIFF DID NOT CO-OPERATE ONLY TOLD IT HAPPENED).

16. PLAINTIFF YOUNG WAS PLACED IN GENERAL POPULATION AT ABOUT 9:50 PM ON SEPTEMBER 27TH 2022 AND SENT TO CUBET BPO CELL 2. UPON ENTERING UNIT PLAINTIFF SEEN THAT A MUSCLE GUY WHO STOOD ABOUT 6'1 280 LBS WAS IN CELL. SHE TOLD GUARD OF HER STATUS OF WOMAN/TRANSGENDER AND WAS TOLD "THIS IS WHAT YOU GET IF YOUR A WOMAN WHO CARES IF HE TAKES YOUR HOLE, IT AINT

GOING TO MEET THAT MUCH "BY OFFICER".

17. PLAINTIFF YOUNG REFUSED TO GO IN CELL AFTER A FEW LOOK IN CELL THAT SHE FOUND INMATE FULLY DRESSED WITH SHOES TIED UP (AT 10:00 PM) WITH ONE FOOT ON BED AND HANDS IN PANTS WHILE INMATE WAS STRAPPED SOMETHINGS THAT SHE ASSUMED WAS A PAPER.

18. LT. AND EXCORT TEAM ARRIVED AND TOOK PLAINTIFF TO THE RHU AFTER SHE FULLY EXPLAINED (ON HAND HEID CAMERA EXCORT PROCEDURES) SHE WAS FEMALE / TRANSGENDER AND FELT UNSAFE IN CELL WITH MEN AND SHE WAS NOW SUICIDAL DUE TO SEI-ALBANY STATE'S FAILURE TO KEEP HER SAFE. PLAINTIFF WAS SENT TO P.O.C PSYCH OBSERVATION CELLS.

19. ON SEPTEMBER 28TH, 2022 DEPUTY PATRICIA THOMPSON CAME TO P.O.C AND ASKED PLAINTIFF IF SHE HAD ANY PROBLEM GOING TO RECEPTION. PLAINTIFF TOLD DEPUTY THOMPSON THAT "I AM TRANSGENDER AND IDENTIFY AS FEMALE, I DON'T WANT TO CELL WITH A MAN OR SEE STRIPPERS WITH ONE". DEFENDANT THOMPSON SAID "THE HELL WITH THAT YOU A GUY AND WE ARE NOT PLAYING YOUR GAMES. YOU ARE NOT MENTALLY ILL AND YOU NOT TRANSGENDER YOU COME TO THE HOLE, ALL YOU WANT IS A Z-CODE". DEFENDANT THOMPSON THEN LEFT.

20. FROM SEPTEMBER 28TH - 30TH 2022 I WAS SEEN AT CELL DOOR IN P.O.C BY DR. GODESMAN, DR. LUKAS WHO BOTH TOLD ME "YOU NOT MENTAL HEALTH YOU NOT A WOMAN AND WE ARE ALL ON TO YOUR GAMES".

21. ON ~~DECEMBER~~ <sup>FREEDAY</sup> NOVEMBER SEPTEMBER 30TH 2022, DR. EVANS CAME TO CELL DOOR AND HAD A CONVERSATION WITH PLAINTIFF ABOUT CLOSING UP GLASSES THAT PLAINTIFF WAS NOT ALLOWED TO HAVE AND PLAINTIFF REFUSED. DEFENDANT DR. EVANS THEN GOT MAD AND TOLD PLAINTIFF "THAT'S WHY YOU NOT GETTING STAY HERE. I RUN THE

MENTAL HEALTH STAFF AND YOU WILL NOT GET ANYTHING. YOU NOT A WOMAN AND YOUR MENTAL HEALTH TREATMENT JUST WENT DOWN THE DRAIN."

22. PLAINTIFF FILED A PRISON REPORT WITH CAPITAL ADVISOR ABOUT THE SEPTEMBER 27TH 2022 INCIDENT WHILE IN P.O.C AND SO FAR IT HAS NOT BEEN LOOKED AT OR INVESTIGATED BY DEFENDANTS.

23. ON MONDAY OCTOBER 3RD 2022, DR. LUCAS AND DR. COESMAN CAME TO CELL DOOR AND TOLD PLAINTIFF "WE ARE ALL IN LINE AT ALBANY, FROM THE SUPERINTENDANTS TO THE GUARDS. YOU NOT A WOMAN AND WE WILL NOT BE GIVING YOU MENTAL HEALTH DIAGNOSES, YOU REMEMBER ME DON'T YOU? I AM DR. COESMAN I HAD YOU BEFORE YOU WENT HOME. UNTIL YOU CONFESS THAT EVERYTHING YOU SAID WAS A LIE YOU NOT GETTING ANYTHING. ADMIT YOU A MAN NOT A WOMAN AND THEN I WILL LET YOU GET SOME MENTAL HEALTH HELP." DR. LUCAS STOOD THERE LAUGHING AND THEN THEY WALKED OFF.

24. DURING THE TIMES OF SEPTEMBER 27TH - OCTOBER 6TH, 2022 I CONTINUED TO REPORT MY VOICES, MANY SEALS COMING OUT THE TOILET, NIGHTMARES, FLASHBACKS, ATTEMPTS TO HURT SELF AND SELF MUTILATION OF PENIS TO DEFENDANTS DR. LUCAS, AND DEFENDANT THOMPSON WHO MADE ROUND ON SEPTEMBER 27TH 2022 IN RHO, AND I WAS TOLD "SO WHAT WE'RE NOT WRITING THAT DOWN, YOUR FILES" BY BOTH.

25. ON OCTOBER 8TH, 2022 I SAW PRT (PSYCH REVIEW TEAM) WHICH INCLUDED DEFENDANTS DR. LUCAS, DR. EVANS, DR. RUSH I ATTEMPTED TO TELL THEM OF MY PTSD, BIPOLAR, SCHIZOPHRENIA DIAGNOSES AND WAS NOT OFF BY DR. RUSH WHO SAID "I DON'T CARE TO HEAR ANY OF THAT. I AM THE HEAD PSYCHOLOGIST



AND YOU HAVE NO MENTAL HEALTH ISSUES EXCEPT ANTISOCIAL PERSONALITY DISORDER AND THAT'S IT. SO LEAVE ALL THE OTHER STUFF OFF THE TABLE BECAUSE WE WILL NOT EVEN TALK ABOUT OR DISCUSS IT!! HE THEN GAVE ME A PILL PRESCRIPTION FOR BLOOD PRESSURE THAT HE CLAIMS IS FOR ANXIETY.

26. AT THAT TIME I TOLD ALL DEFENDANT IN # 25 THAT I HAVE AN EXTENSIVE HISTORY OF MENTAL ILLNESS AND MY SYMPTOMS TO WHICH I WAS EXPOSED AND ASKED DR. LUCAS AND DR. EVANS LAUGHED AT SAYING "NOT NO MORE YOU HAVE A BEHAVIORAL PROBLEM THAT'S IT"

27. ON OCTOBER 8TH, 2022 AFTER AN ATTEMPT TO EAT MY ASTHMA INHALER I WAS PLACED IN A HARD CELL WHERE MY VOICES TOLD ME TO SING & GET MY FEETES WHICH I DID ON CAMERA. I SAT IN CELL FOR 3 DAYS WITH FEETES SINGING NAMED WITH ONLY A SUCCEED SINGING UNDER DEFENDANT CPT. JONES ORDERS

28. ON OCTOBER 8TH, 2022 AFTER A BRIEF STRUGGLE OFFICER SLID ME INTO HB-10 CELL ON MY STOMACH AND PUT A FINGER OR/AND INSTRUMENT INSIDE MY RECTUM EFFECTIVELY SEXUALLY ASSAULTED ME. I STARTED SCREAMING ABOUT IT AND THE OFFICERS RAN TO GET A HAND HEID CAMERA. ONCE CAMERA WAS ON I REPORTED THIS SEXUAL ABUSE LOUDLY AND CLEARLY. OFFICERS THEN STOPPED ME UP AND ON CAMERA I SAID "WAIT I GOTTA TELL MY PARENTS ABOUT THIS" DUE TO MY BUT BEING CUT IN PAIN AND. I WENT TO INMATE MADDOX IN HB-4 CELL AND INMATE HAYNES IN HB-5 CELL WITNESSED PARTS OF THIS.

29. I WAS TAKEN TO MEDICAL TRIAGE AFTER OFFICERS PAIN MY HEAD INTO DOOR AND SAID MY EAR WAS VIBRATING AND UNUSUAL. I TOLD MEDICAL NURSE AND DOCTOR THAT I WAS SEXUALLY PENETRATED BY OFFICERS AND ASKED TO WHICH SHE SAID "DO NOT DO PREG EXAMS" ON CAMERA. AT THAT TIME I TOLD CAMERA ABOUT OF SEXUAL ABUSE AND CAMERA AND PAINLY HEARD CPT. JONAS SAY "DISREGARD THAT". BOTHED I WAS



DONE ABOUT THIS AND I VOLUNTARY WALKED TO STRIP CAGE. I WAS STOPPED OUT-  
SIDE OF STRIP CAGE AND TOLD MY CLOTHES WOULD NEED TO BE CUT OFF AND  
THROWN AWAY BY LT. TO WHICH I PROTESTED BUT COMPLIANT FULLY. THIS WAS  
THE CPT. JOHNSON GETTING TOLD OF EVIDENCE OF SEXUAL ASSULT. NO TYPE  
OF RAPE KIT OR MEDICAL WAS GIVEN DUE TO REFUSAL JOHNSON ORDERS.

30. PLAINTIFF ASSERT THAT SHE IS IN IMMINENT DANGER OF MENTAL HEALTH DET-  
RIORATED AND SEXUAL ASSULTS BY GUARDS AND PRISONERS TO WHICH SHE ATTEMPTED  
TO FILE SEXUAL PRISON COMPLAINTS TO LT. BISHOP AND STILL NOTHING WAS DONE  
OR EVEN AN INTERVIEW DONE AND IT IS OCTOBER 20TH 2022 NOW. ALL  
DEFENDANTS WERE NOTIFIED OF SEXUAL ASSULT VIA DC-155A IMMEDIATE REQUEST  
SLIPS OR VOICALLY. NO ONE DID ANYTHING AT ALL.

31. ON OR ABOUT OCTOBER 18TH 2022 GREENLAND CO-ORDINATOR C. GOODRICH CAME  
OUT TO COLLECT GREENLANDS IN RNU. I TOLD HER OUT CELL DOOR THAT I WAS  
SEXUALLY ASSAULTED AND NEED IMMEDIATE MEDICAL HEALTH CARE AND ABOUT ALL MY  
SYMPTOMS AND SHE SAID "WHILE WALKING" "GIVE IT A BREAK YOUR YOUR  
A HEALTHY MALE AND NOTHING'S WRONG WITH YOU. MOTHER F\*CK YOUR GREENLANDS  
DAYS ARE DONE TOO, NO MORE FELIX GREENLANDS WE DON'T WANT TO HEAR IT  
AND THAT'S FROM THE SUPERVISOR."

I, LEONARD YOUNG, HEREBY SWEAR AND ADVE THAT THE FOREGOING FACTS  
AND COMPLAINT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, BELIEF, AND  
UNDERSTANDING UNDER PENALTY OF PERJURY AND THIS SHOULD SERVE AS MY DECLAR-  
ATION IN SUPPORT OF CIVIL ACTION ALSO.

X.   
LEONARD YOUNG

OCTOBER 20TH 2022

## VI. EXHAUSTION OF REMEDIES

32. PLAINTIFF HAS FILED NUMEROUS GRIEVANCES AT SCE-ALBANY ON ALL DEFENDANTS. DUE TO THE CONSPIRACY FROM ALL DEFENDANTS THEY HAVE MADE SEVERAL ATTEMPTS TO HINDER THE PROCESS BY ANSWERING GRIEVANCES AND NOT GIVING PLAINTIFF NOTICE/COPY OF GRIEVANCE UNTIL TIME TO APPEAL HAS ELAPSED. DEFENDANTS HAVE ALSO SIMPLY GIVEN PLAINTIFF ATTACHMENT # 1A (SEE HUNT FEELINGS REPORT) STATING SHE WILL NOT FILE A DC-804 INMATE GRIEVANCE ANYMORE AT SCE-ALBANY.

33. PLAINTIFF ASSERTS THAT AN INMATE GRIEVANCE CANNOT PER PA. DOC POLICY, FILE A GRIEVANCE ON PREA (PREVIOUS RAPE ELIMINATION ACT) ISSUES. SHE HAS FILED SEVERAL HOWEVER ALL THAT HAS BEEN REJECTED AND NEVER INVESTIGATED PROPERLY. SHE ALSO ASSERTS THAT DEFENDANTS CONSPIRE TO OVERLOOK/IGNORE HER PREA COMPLAINTS ENTIRELY.

ALL FILED DC-804 INMATE GRIEVANCES AS WELL AS CONSPIRACY SHOULD BE EXPOSED AT DISCOVERY PHASE.

## VII. LEGAL CLAIMS

34. DEFENDANT C. GREEDGES AND SUPERINTENDANT L.J. OLIVER VIOLATED PLAINTIFFS PROCEDURAL DUE PROCESS BY DENYING PLAINTIFF ACCESS TO PERA GRIEVANCES AND/OR HINDERING THE FILING OF APPEALS. DEFENDANTS USED RETALIATORY CONDUCT WITH MALICIOUS AND SADISTIC INTENT BY GIVING PLAINTIFF ATTACHMENT EXHIBIT 1-A WHEN HE ASKED TO REPORT CLAIMS OF SEXUAL ABUSE AND DENIAL OF MENTAL HEALTH. BOTH DEFENDANTS THEREFORE VIOLATED PLAINTIFFS RIGHTS UNDER THE 1ST AMENDMENT TO THE UNITED STATES CONSTITUTION. THE ILLEGAL ACTIONS ARE CAUSING PLAINTIFF HARM TO HER 1ST AMENDMENT RIGHTS.

35. DEFENDANTS CPT. JENNISON, CORM KURT SUESSER, LT. BAKER, USED AND CONTINUE TO USE EXCESSIVE

FORCE, CRUEL AND UNUSUAL PUNISHMENT, AND DELIBERATE INDIFFERENCE TO SERIOUS MENTAL INJURY BY DENYING PLAINTIFFS MEDICAL SERVICES (IE RAPE KIT, PAIN TREATMENT AND SERVICES) AFTER SHE REPORTED A SEXUAL ABUSE AT TIME IT HAPPENED. THESE DEFENDANTS TOOK STEPS TO ACTIVELY COVER IT UP AND/OR NOT REPORT IT AT ALL CAUSING PLAINTIFFS PAIN, SUFFERING, MENTAL AND EMOTIONAL DISTRESS. DEFENDANTS VIOLATED PLAINTIFFS 8TH AMENDMENT RIGHTS UNDER THE CONSTITUTION OF THE UNITED STATES.

36. DEFENDANT CPT. JENNARD VIOLATED THE 8TH AMENDMENT RIGHTS OF PLAINTIFFS OF DELIBERATE INDIFFERENCE AND RETALIATORY CONDUCT RESULTING IN CRUEL AND UNUSUAL PUNISHMENT BY PLACING PLAINTIFFS IN A HARD CELL SEGREGATION HALLWAY NAMED FOR DAYS WITH FEELERS SMOTHERED ON THE WINDOW AND WALLS. DEFENDANT REFUSED TO ALLOW PLAINTIFFS TO EAT FOR 5 MEALS UNTIL SHE CLEANED IT OFF BY HAND AND REFUSED TO ALLOW HER ACCESS TO SHOWER OR HYGIENE ITEMS TO WASH OFF. SHE WAS KEPT IN FREEZING COLD CELL DURING MEDICATIONS AND EXERCISES IN A 24/7 BRIGHT LIGHT CELL RESULTING IN HEADACHES, JITTERS, LCO, AND SERIOUS DEHYDRATION FOR NO PENITENTIAL PURPOSE.

37. DEFENDANTS LT. BASHOR, CAPT. KURT SWER, DEPUTY PATRICIA THOMPSON, SUPERINTENDENT L.T. OLIVER ALL USED CRUEL AND UNUSUAL PUNISHMENT AND DELIBERATE INDIFFERENCE AS WELL AS ATYPICAL AND DISCRIMINATORY HANDLING BY UNLAWFULLY PLACING A TRANSGENDER WOMAN IN A CELL WITH A HOSTILE LIZ FAD JBS MURKIN AT 9:58 PM WHERE SHE WAS TO POSSESS TO BE VERBALLY ABUSED, MENTALLY AND PHYSICALLY ABUSED. ALL DEFENDANTS KNEW AND HAD KNOWLEDGE OF ~~DISCRIMINATORY~~ PLAINTIFFS LGBTQ STATUS AND HAD TO BE AWARE THAT PLACING HER IN THAT CELL OR SITUATION VIOLATED HER 8TH AMENDMENT RIGHTS TO THE UNITED STATES CONSTITUTION. ESTELLE V. GAMBLE, SADDON V. LOUWER AFFIDAVITS APPLY HERE.

38. ALL DEFENDANTS KNEW OF AND HAD DIRECT KNOWLEDGE OF PLAINTIFFS TRANSGENDER STATUS AND MADE IT A POINT TO NOT DOCUMENT, EXCEPT STATUS, AND THEREFORE THEY CONSPIRED TO HARASS AND RETALIATE ON PLAINTIFFS BASED ON PLAINTIFFS PAST STATE NUMBER AND THE WOUNDING OF CIVIL ACTION *YOUNG V. MARTIN*.

39. DEFENDANTS PA. DEC, DEPUTY PATRICIA THOMPSON, SUPERINTENDANT L.S. OLIVER, CHICA EDWARDS, CORM KURT SUESSER, DR. CRAIG RUSH, DR. GOTTSMEN, DR. LUCAS, AND DR. EVANS, USED AND CONTINUE TO USE EXCESSIVE FORCE, DELIBERATE INDIFFERENCE / RETALIATORY CONDUCT ALL WITH SADISTIC AND MALEVOUS INTENTIONS TO INFLECT CRUEL AND UNUSUAL PUNISHMENT. ALL DEFENDANTS CONSIDERED TO DENY PLAINTIFF MENTAL HEALTH TREATMENT FOR HIS BIPOLAR, POST TRAUMATIC STRESS DISORDER, SCHIZOPHRENIC DISORDERS KNOWLEDGELY AND WITH OTHERS IN PUT SUBJECTING HER TO MENTAL, PHYSICAL INJURY, AND TO SUFFER IN SOLITARY CONFINEMENT WHERE HER CONDITIONS CONTINUE TO DEGRADATE. DEFENDANT THEREFORE VIOLATE PLAINTIFF'S 8TH AMENDMENT RIGHT TO THE UNITED STATES CONSTITUTION KNOWLEDGELY AFTER BEING SHOWN PROOF FROM *YOUNG V. MARTIN*, CRIMINAL COURTS CCH CP-OR-CR-COLL-2005, AND *YOUNG V. MURPHY* DOCUMENTS AS WELL AS ASKING TO LOOK AT 2005 INJURY MENTAL HEALTH UP UNTIL 2010 WHEN PLAINTIFF WAS SENT TO (SMU) SPECIAL MANAGEMENT UNIT AND THE PROCESS STARTED TO START TREATING HER AS BEHAVIORAL AND MINDSET IN A CONSPIRACY NOT TO TREAT ME FOR MENTAL ILLNESS THEREBY SUBJECTING HER TO THE SAME FINDINGS OF DEPARTMENT OF JUSTICE REPORT AND RECOMMENDATION.

40. BY CONTINUING TO DENY PLAINTIFF MENTAL HEALTH DISORDERS AND RELIEF, AS WELL AS A FAILURE TO PROTECT HER FOR LGBTQ TRANSGENDER/WORKER IDENTITY AND TO SEEK REDRESS PLAINTIFF HAS NO PRESENT, ADEQUATE, OR COMPLETE REMEDY AT LAW TO REDRESS THE WRONGS DESCRIBED HEREIN. PLAINTIFF HAS BEEN AND WILL CONTINUE TO BE IRREPARABLY HARMED BY THE CONDUCT OF THE DEFENDANTS UNLESS THIS COURT GRANTS THE DECLARATORY AND INJUNCTIVE RELIEF WHICH PLAINTIFF SEeks.

### VIII. PRAYER FOR RELIEF

WHEREFORE, PLAINTIFF RESPECTFULLY PRAY THAT THIS COURT ENTER JUDGEMENT:

41. GRANTING PLAINTIFF A DECLARATION THAT THE ACTS AND OMISSIONS DESCRIBED HEREIN VIOLATE HER RIGHTS UNDER THE CONSTITUTION AND LAWS OF THE UNITED STATES, AND

42. A PRELIMINARY AND PERMANENT INJUNCTION ORDERS DEFENDANTS TO PROVIDE PLAINTIFF WITH ADEQUATE PROTECTION FOR TRANSGENDER / WOMAN IDENTITY AND TO TREAT / DISTANCE HER WITH THE KNOWN MENTAL HEALTH ISSUES ON FILES / RECORDS, AND

43. GRANTING PLAINTIFF COMPENSATORY DAMAGES IN THE AMOUNT OF \$50,000 AGAINST EACH DEFENDANT, JOINTLY AND SEPARATELY

44. PLAINTIFF SEEKS NOMINAL DAMAGES AND PUNITIVE DAMAGES IN AMOUNT OF \$50,000 AGAINST EACH DEFENDANT JOINTLY AND SEPARATELY

45. PLAINTIFF SEEKS MEDIATION ON THIS ISSUE AND/OR SETTLEMENT. IF NOT POSSIBLE JURY TRIAL.

46. PLAINTIFF SEEKS RECOVERY OF COSTS IN THIS SUIT

ANY ADDITIONAL RELIEF THAT COURT DEEMS JUST, PROPER, AND EQUITABLE.

DATED: NOVEMBER 9TH 2022

RESPECTFULLY SUBMITTED,

LEONARD YOUNG # QA-0396

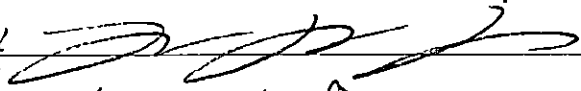
10745 ROUTE 18

ALBION PA. 16475 - 0002

### VERIFICATION

I HAVE READ THE FOREGOING COMPLAINT AND HEREBY VERIFY THAT THE MATTERS ALLEGED THEREIN ARE TRUE, EXCEPT AS TO MATTERS ALLEGED ON INFORMATION AND BELIEF, AND, AS TO THOSE, I BELIEVE THEM TO BE TRUE. I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED AT ALBION PENNSYLVANIA ON NOVEMBER 9TH 2022

X   
LEONARD YOUNG

## CERTIFICATE OF SERVICE

I, LEONARD YOUNG, HEREBY ATTEST THAT A TRUE AND CORRECT COPY OF PLAINTIFF'S  
AMENDED COMPLAINT WAS SENT VIA 1ST CLASS MAIL TO:

1) WETZEL DISTRICT

CLERK OF COURTS

17 SOUTH PARK ROW

ELITE PA. 16501

DATED: NOVEMBER 9TH 2022

BY: LEONARD YOUNG #QA-0396



10745 ROUTE 18

ALBION PA. 16475-0002